

EXHIBIT D

**THIRD PARTY PAYORS REQUESTING EXTENSIONS
TO COMPLETE PLAINTIFF FACT SHEETS AND/OR
TO PROVIDE CORRESPONDING DATA AND DOCUMENTS**

No.	Plaintiff	Case No.	Counsel	Code¹	Reason(s) for Delay
1.	Roofers Local 8 WBPA Fund	19-op-46147	Mark Tate	2	Optum Rx has objected to subpoena
2.	Laborers Local 235 Welfare Fund LIUNA	19-op-45792	Mark Tate	3, 5	Express Scripts ("ESI") has been subpoenaed
3.	Painting Industry Insurance Fund	19-op-45793	Mark Tate	3	ESI has been subpoenaed
4.	Structural Steel 806 Health Plan	19-op-45831	Mark Tate	3	ESI has been subpoenaed
5.	AFL-CIO Local 475 Health & Welfare Fund	19-op-45941	Mark Tate	2, 4	- Optum Rx has objected to subpoena; - Awaiting data from CVS; - Awaiting data from Alicare for 2015-2016
6.	IUOE Local 138 Health Benefit Fund	19-op-45943	Mark Tate	2	Optum has objected to subpoena
7.	United Crafts Benefits Fund	19-op-45945	Mark Tate	2, (4)	- Optum has objected to subpoena; - Empire BCBS data seems inaccurate and may be supplemented
8.	Uniformed Fire Officers Association Benefits Fund	19-op-45946	Mark Tate	3	ESI has been subpoenaed
9.	United Wire, Metal & Machine Local 810 Health Benefit Fund	19-op-46105	Mark Tate	3	ESI has been subpoenaed
10.	Teamsters Local 445 Welfare Fund	19-op-46146	Mark Tate	3, 4	- ESI has been subpoenaed; - MVP Healthcare provided data only for 2018-2019

¹ Codes are as follows:

1. Unable to complete the PFS
2. Unable to make a substantial production of pharmacy data (per Exhibit B)
3. Unable to produce "total amount billed" field of the pharmacy data (columns included on the Exhibit B)
4. Unable to make a substantial production of medical healthcare data (per Exhibit C)
5. Unable to produce any formularies
6. Unable to produce any Summary Plan Descriptions ("SPDs")

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11.	Iron Workers Local 40 Health Fund	20-op-45027	Mark Tate	2	Optum has objected to subpoena
12.	Iron Workers Local 361 Health Fund	20-op-45028	Mark Tate	2	Optum has objected to subpoena
13.	Iron Workers Local 417	20-op-45029	Mark Tate	2	Optum has objected to subpoena
14.	UFCW Local 342 Healthcare Fund	20-op-45033	Mark Tate	2, 3, 5	- ESI has been subpoenaed; - Awaiting all data from EmpiRx - Still attempting to collect formularies
15.	UFCW Local 342 Welfare Fund	20-op-45034	Mark Tate	2, 3, 4, 5	- ESI has been subpoenaed; - Awaiting all data from EmpiRx; - Empire BCBS data seems inaccurate and may be supplemented - Still attempting to collect formularies
16.	UFCW Local 1500 Welfare Fund	20-op-45041	Mark Tate	3, (4)	- ESI has been subpoenaed; - Empire BCBS data seems inaccurate and may be supplemented
17.	Teamsters Local 456 Welfare Fund	21-op-45067	Mark Tate	2, 4, 5	- Optum has objected to subpoena; - Empire BCBS data seems inaccurate and may be supplemented - Still attempting to collect formularies
18.	Brighton Health Plan Solutions d/b/a MagnaCare Admin. Services	19-op-45837	Mark Tate	2	Awaiting data from PBM, Elixir
19.	Brighton Health Plan Solutions d/b/a MagnaCare Admin. Services and Magnacare, LLC	19-op-45838	Mark Tate	2	Awaiting data from PBM, Elixir
20.	Building Services Local 2 Welfare Fund	19-op-45991	Mark Tate	(4)	Empire BCBS data seems inaccurate and may be supplemented

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21.	CWA 1182 & 1183	19-op-45794	Mark Tate	5	EmpiRx did not provide formularies
22.	Drywall Tapers Insurance Fund	19-op-45810	Mark Tate	2, (4)	- PBM data for 2018-2019 has been uploaded, but, plaintiff's representation that EmpiRx was PBM for remainder of time period was denied by EmpiRx - Empire BCBS data seem inaccurate and may be supplemented
23.	International Brotherhood of Trade Unions Local 713	19-op-45832	Mark Tate	2	Awaiting data from American Healthcare (now operating as Maxor)
24.	Local 381 Group Insurance Fund	19-op-45942	Mark Tate	(4)	Empire BCBS data seem inaccurate and may be supplemented
25.	NOITU Insurance Trust Fund	19-op-45808	Mark Tate	4	Anthem BCBS data seem inaccurate and may be supplemented
26.	UOPW Local 175	19-op-45940	Mark Tate	(2), 5	- Broadreach Medical Resources, Inc.'s data seems inaccurate and may be supplemented - Plaintiff indicated no formularies for fund
27.	Cleveland Bakers and Teamsters Health & Welfare Fund	18-op-45432	Paul Geller	3	Optum has been subpoenaed
28.	Laborers' District Council Building and Construction Health and Welfare Fund	21-op-45019	Frank Voler	1, 2, 4, 5, 6	No response from client
29.	Employer-Teamsters Local Nos. 175 & 505 Health & Welfare Fund	18-op-45446	Neil Henrichsen; Jonah Grabelsky	1, 2, 4, 5, 6	PBM/Administrator has been delayed providing information
30.	Employer-Teamsters Local Nos. 175 & 505 Retiree Health & Welfare Fund	18-op-45446	Neil Henrichsen; Jonah Grabelsky	1, 2, 4, 5, 6	PBM/Administrator has been delayed providing information

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31.	Teamsters Local No. 348 Health & Welfare Fund	18-op-45446	Neil Henrichsen; Jonah Grabelsky	1, 2, 4, 5, 6	PBM/Administrator has been delayed providing information
32.	Ohio Conference of Teamsters & Industry Health And Welfare Fund	18-op-45446	Neil Henrichsen; Jonah Grabelsky	1, 2, 4, 5, 6	PBM/Administrator has been delayed providing information
33.	Midwest Operating Engineers Health & Welfare Fund ("MOE")	19-op-45414	Jay Edelson; Michael Ovca	1, 2, 4, 5, 6	MOE is working diligently with their PBM and Medical Admin teams to gather the requested data as quickly as possible. Because of confusion about which TPPs were required to obtain this data in light of pending removal motions, MOE started this process later than other TPPs. MOE anticipates having the PFS completed by the original deadline, and providing much of the additional material requested as well. However, out of an abundance of caution, MOE requests an extension to ensure this process can be completed without prejudice to its case.

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34.	IUOE Local 150	19-op-45414	Jay Edelson; Michael Ovca	1, 2, 4, 5, 6	Local 150 is continuing to evaluate whether they intend to participate as a bellwether or otherwise continue their case in the MDL, including whether to dismiss their case or complete the PFS and obtain related material. They seek a brief extension to complete this process.
35.	Chicago Regional Council of Carpenters Welfare Fund ("CRCC")	19-op-45414	Jay Edelson; Michael Ovca	1, 2, 4, 5, 6	CRCC is working diligently with their PBM and Medical Admin teams to gather the requested data as quickly as possible. Because of confusion about which TPPs were required to obtain this data in light of pending removal motions, the CRCC started this process later than other TPPs. CRCC anticipates having the PFS completed by the original deadline, and providing much of the additional material requested as well. However, out of an abundance of caution, CRCC requests an extension to ensure this process can be completed without prejudice to its case.

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36.	Intergovernmental Risk Management Agency (“IRMA”)	18-op-46210	Jay Edelson; Michael Ovca	1, 2, 4, 5, 6	IRMA is working diligently with their PBM and Medical Admin teams to gather the requested data as quickly as possible. This has included working with Corvell, IRMA’s PBM, to make sure that AI confidentiality concerns were addressed regarding plan information. Because of confusion about which TPPs were required to obtain this data in light of pending removal motions, IRMA started this process later than other TPPs. IRMA anticipates having the PFS completed by the original deadline, and providing much of the additional material requested as well. However, out of an abundance of caution, IRMA requests an extension to ensure this process can be completed without prejudice to its case.
37.	Intergovernmental Personnel Benefit Cooperative (“IPBC”)	18-op-46210	Jay Edelson; Michael Ovca	1, 2, 4, 5, 6	IPBC is working diligently with their PBM and Medical Admin teams to gather the requested data as quickly as possible. Because of confusion about

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					<p>which TPPs were required to obtain this data in light of pending removal motions, IPBC started this process later than other TPPs. IPBC anticipates having the PFS completed by the original deadline, and providing much of the additional material requested as well. However, out of an abundance of caution, IPBC requests an extension to ensure this process can be completed without prejudice to its case.</p>
38.	Eastern Atlantic States Carpenters Health Fund	18-op-45741	Jayne Conroy; Sarah Burns	2, 4, 5, 6	<p>Eastern Atlantic State Carpenters Health Fund is the product of a recent merger of two substantial funds: Carpenters Health & Welfare Fund of Philadelphia & Vicinity and Northeast Carpenters Health Fund. Plaintiff and its counsel are working diligently, alongside a data expert, to compile historic data sources across both merged funds in order to respond to 2, and 4. This may require that plaintiff serve a subpoena on ESI and if so, plaintiff will do so in short order. Plaintiff and its</p>

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					counsel are also reviewing materials to compile a fulsome response to codes 5 and 6
39.	Teamsters Local 671 Health Services & Insurance Plan	18-op-45092	David Cheverie	2, 4, 5	The PBMs have been extremely slow to respond to our requests, however we have been informed that the outstanding requests for data, costs, and formularies will be provided within 10 business days.
40.	Laborers Local 17 Benefit Fund	18-op-45072	David Cheverie	2, 4, 5	ESI was unresponsive to our requests to provide data, however during the last discussion on August 30, 2023, ESI agreed to provide the requested information. If ESI fails provide the information within the next two weeks our office will be serving a subpoena for the requested information.
41.	Local 493 Teamsters Health Services and Insurance Plan	18-op-45074	David Cheverie	5	Administrator advised that there were no formularies during that time
42.	Teamsters Health Service and Insurance Plan Local 404	18-op-45001	Frank Schirripa	5	Administrator advised that there were no formularies during that time

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43.	IBEW Local 716 Electrical Medical Trust	20-op-45148	J. Nixon Daniel; Roe Frazer	4	The plaintiff has been trying to get Aetna to provide the necessary medical information and has been told that it will not likely make the September 5 deadline. The Plaintiff's Fact Sheet with all other information will be filed on or before September 5, 2023
44.	South Central UFCW Unions and Employers Health & Welfare Trust	18-op-45998	J. Nixon Daniel; Roe Frazer	1, 2, 4, 5, 6	The plaintiff has completed the narrative of the PFS but cannot finalize the PFS without information related pharmacy and healthcare data which it is diligently trying to obtain. It is anticipated that it will not be able to obtain that information by the September 5, 2023 deadline.
45.	UFCW Local 1000 Oklahoma Health and Welfare Fund	18-op-45733	J. Nixon Daniel; Roe Frazer	1, 2, 4, 5, 6	The plaintiff has been unable to complete the information required and does not think it will make the September 5, 2023 deadline. It is currently working on gathering the information.

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46.	New York District Council of Carpenters Welfare Fund	20-op-45095	Regina Calcaterra; Anjori Mitra	2	The client's PBM, Express Scripts, has not provided data in the Excel spreadsheet format required. In order to put the data into the required format, thousands of data entries must be reviewed and input manually into the spreadsheet in the required format. Only a brief extension is needed.
47.	Hollow Metal Trust Fund	20-op-45094	Regina Calcaterra; Anjori Mitra	2, 4	<p>Plaintiff's PBM, ESI, has not provided data in the Excel spreadsheet format required. In order to put the data into the required format, thousands of data entries must be reviewed and input manually into the spreadsheet in the required format.</p> <p>In addition, Plaintiff has sought the necessary data from its Third Party Medical Benefits Administrator, C&R Consulting, which provided Plaintiff with benefits between June 2005 and June 2022. Because C&R Consulting no longer provides services to Plaintiff, C&R Consulting was initially unable to</p>

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					<p>provide the necessary data to Plaintiff, and only this week advised that the data is now in external storage and may only be provided for a fee. Plaintiff is evaluating its options in retrieving this data including the possibility of a subpoena.</p> <p>Plaintiff has also experienced difficulties identifying its Medical Benefits Administrator for 2002-June 2005 and is reviewing its records (many of which are not digitized) in order to identify this administrator so that a data request may be made.</p>
48.	Plumbers Local Union No. 1 Trust Fund	18-op-45838	Regina Calcaterra; Anjori Mitra	1, 2, 4, 5	A key contact has been on PTO during the preparation of the PFS, which has slowed the completion of the PFS. Plaintiff has not been provided any pharmacy or medical data by its PBMs or Medical Benefits Administrators to date and Plaintiff will need to evaluate if further steps (such as subpoenas) are necessary or if the production of the data

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					has simply been taking longer than anticipated. Plaintiff is also unable to locate any formularies.
49.	Teamsters Local 237 Retirees' Benefit Fund and Teamsters Local 237 Welfare Fund	18-op-45174	Regina Calcaterra; Anjori Mitra	1, 2	A key contact has been on PTO during the preparation of the PFS, which has slowed the completion of the PFS. In addition, the clients' PBM has not provided data in the excel spreadsheet format required. In order to put the data into the required format, the data provided must be reviewed and input manually into the spreadsheet in the required format. Only a brief extension is needed.
50.	Flint Plumbing and Pipefitting Industry Health Care Fund	19-op-45430	Hunter Shkolnik; Shayna Sacks	2, 3	BCBS Michigan produced the medical data and has indicated the PBM data should arrive on the deadline however, as plaintiff's counsel is not in possession of the data, it requests time to review the production before serving. Plaintiff will serve a subpoena if needed.
51.	Ohio Carpenters' Health Fund	19-op-45072	Hunter Shkolnik; Shayna Sacks	3, 4	Plaintiff is in communication with the PBM to supplement the data received to include

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					the missing column. It requests time to continue these discussions. Plaintiff will serve a subpoena if needed. As to 4, the administrator, Benesys, is cooperative but is requesting additional time to produce the data due to staff storage.
52.	Local 22 Health Benefit Fund	19-op-45811	Randi Kassan	1, 2, 4, 5, 6	Plaintiff is unable to provide the materials on the short deadline given and is working through the data.
53.	Building Trades Welfare Benefit Fund	19-op-45899	Randi Kassan	1, 2, 4, 5, 6	Plaintiff is unable to provide the materials on the short deadline given and is working through the data.
54.	Southern Tier Building Trades Benefit Plan	20-op-45239	Randi Kassan	1, 2, 4, 5, 6	Plaintiff is unable to provide the materials on the short deadline given and is working through the data.
55.	International Union of Painters an Allied Trades 1974	19-op-45854	Randi Kassan	1, 2, 4, 5, 6	Plaintiff is unable to provide the materials on the short deadline given and is working through the data.
56.	Asbestos Workers Local 6 Health and Welfare Fund	18-op-45542	Evan Hoffman	2, 4	PBM and health administrator are no longer the current administrators for the plan and gathering information from legacy administrators has been taking longer than anticipated. Data that the fund may have had in its possession when

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					those administrators were active is no longer in the fund's possession. The fund is still determining the best way to obtain the information (i.e. subpoena or other means) and expects to have it shortly, though not by September 5.
57.	MSP Recovery Claims, Series LLP (Counsel did not provide individual TPP Assignor information as to which will meet the deadline and which will not respecting this Assignee for either case the Assignee filed)	18-op-45091 And 18-op-45526	John Cleary; Janpaul Portal	Not Provided	Counsel represented that they can upload materials to be in substantial compliance for a number of the Assignors in MSP's case. However, for other assignors they have reached out to the entities to acquire some missing information.
58.	MSPA Claims 1, LLP (Counsel did not provide individual TPP Assignor information as to which will meet the deadline and which will not respecting this Assignee)	18-op-45526	John Cleary; Janpaul Portal	Not provided	Counsel represented that they can upload materials to be in substantial compliance for a number of the Assignors in MSP's case. However, for other assignors they have reached out to the entities to acquire some missing information.

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59.	MAO-MSO Recovery II, LLC (Counsel did not provide individual TPP Assignor information as to which will meet the deadline and which will not respecting this Assignee)	18-op-45526	John Cleary; Janpaul Portal	Not provided	Counsel represented that they can upload materials to be in substantial compliance for a number of the Assignors in MSP's case. However, for other assignors they have reached out to the entities to acquire some missing information.
60.	Series 17-03-615, a designated series of MSP Recovery Claims, Series LLC (Counsel did not provide individual TPP Assignor information as to which will meet the deadline and which will not respecting this Assignee)	21-op-45079	John Cleary; Janpaul Portal	Not provided	Counsel represented that they can upload materials to be in substantial compliance for a number of the Assignors in MSP's case. However, for other assignors they have reached out to the entities to acquire some missing information.